

JAMES T. CONLEY, SBN 224174  
james.conley@ogletree.com  
HAIDY M. RIVERA, SBN 322117  
haidy.rivera@ogletree.com  
OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.  
500 Capitol Mall, Suite 2500  
Sacramento, CA 95814  
Telephone: 916-840-3150  
Facsimile: 916-840-3159

Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.

**UNITED STATE DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

DOREENA GONZALES, an individual;

Plaintiff,

vs.

WAL-MART ASSOCIATES, INC., a Delaware  
corporation; and DOES 1 through 50, inclusive;

Defendants.

Case No. 3:21-cv-10085-JD

**DEFENDANT’S REQUEST FOR A  
REMOTE APPEARANCE FOR  
PLAINTIFF’S SCHEDULED MOTION  
FOR LEAVE TO WITHDRAW AS  
COUNSEL OF RECORD**

Date: **September 8, 2022**  
Time: **10:00 a.m.**  
Place: **Courtroom 11**  
Hon. James Donato

Action Filed: November 10, 2021  
Removal Filed: January 3, 2022  
Trial Date: October 16, 2023

**TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT  
OF CALIFORNIA:**

James T. Conley, lead counsel for Defendant Walmart Inc., respectfully requests permission to appear telephonically or via remote appearance on September 8, 2022, at 10:00 a.m. before the Honorable James Donato for Plaintiff's Motion for Leave to Withdraw as Counsel. First, Mr. Conley is scheduled for two hearings that day at almost the same time in different locations—the other one is at 11:00 a.m. in the San Jose Division of this Court—*Fiscina v. Walmart*, Case No. 5:21-cv-08557-EJD. Second, this motion concerns Plaintiff and her counsel and there is nothing anticipated at the hearing where an in-person appearance by Walmart would be helpful to resolving these issues. Third, Mr. Conley lives in Truckee, and would have to travel several hours to San Francisco in order to attend Plaintiff's Motion for Leave to Withdraw as Counsel of Record scheduled for September 8, 2022. Attending remotely would allow Defendant's counsel to avoid the unnecessary time and expense in traveling from Truckee to San Francisco in order to attend this hearing in-person.

DATED: August 30, 2022

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: 

James T. Conley  
Haidy M. Rivera

Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.